

April 17, 2011

VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: **EX PARTE PRESENTATION**

*Telecommunications Relay Services and Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities*
CG Docket No. 03-123

On April 14, 2011, Rob Engelke and Kevin Colwell of Ultratec, Jayne Turner, of Captioned Telephone Inc., and Dixie Ziegler and Anne Girard of Hamilton Relay ("Hamilton") met with Gregory Hlibok, Diane Mason, and William Freedman of the Consumer and Governmental Affairs Bureau.

At the meeting, Hamilton announced that it has captioned telephone ("CapTel") workstations in operation in one of its relay call centers. Hamilton explained that it is starting small but will be growing the number of workstations in which it is processing CapTel calls quickly. With the addition of multiple locations processing CapTel calls, concerns represented in the NASRA letter filed on March 16, 2011 around geographic diversity are beginning to be addressed. In order to make this happen, Ultratec has licensed its technology to Hamilton.

Ultratec further explained how CapTel has achieved network and switching redundancy with two independent locations. Ultratec also addressed items in NASRA's filing regarding several recent instances in which answer performance standards were not met. Hamilton and Ultratec hope to meet with representatives from NASRA to discuss its March 16th filing. After that discussion, Hamilton and Ultratec will file a report with the FCC responding directly to NASRA's letter and will share historically answer performance data.

Staff asked several questions regarding the transition of CapTel users from PSTN CTS based services to IP CTS services. Ultratec stated that the 800i (an internet based CapTel phone) gives users the ability to easily place and **receive** calls, and captions are delivered faster to the 800i device as the text remains in a digital format at all times when delivered over the internet. Staff also asked about the need to mandate Captioned Telephone Service. Hamilton and Ultratec stated that the majority of CapTel traffic is still PSTN based. To protect the users of those services, Staff may want to consider the need for mandate for these services. Staff asked Ultratec several questions regarding its current patents.

Ultratec asked if international calls placed from the 800i are reimbursable from the Interstate TRS fund. Today, these calls are not allowed as Ultratec and Hamilton determined that it would be best to follow the practices of IP Relay. However, the 800i gives users no incentive to place international calls as the user does pay for any and all associated toll charges. Staff clarified that its IP Relay rules do not apply to IP CTS unless otherwise stated and further stated that if additional clarification was needed that Hamilton and Ultratec could file a request for clarification.

Ultratec stated that costs for Captioned Telephone have been low and stable. Hamilton and Ultratec look to continue this trend but both parties indicated that with additional sites, additional costs will be incurred.

Finally Hamilton reminded staff of its open Petition for Clarification filed in response to the FCC's February 25, 2011 order.

This filing is made in accordance with Section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2).

Respectfully submitted,

/s/ Dixie Ziegler
Vice President
Hamilton Relay, Inc.

cc (via e-mail): Gregory Hlibok
Diane Mason
William Freedman